

1 KEVIN V. RYAN (CSBN 118321)
United States Attorney
2
3 MARK L. KROTOSKI (CASBN 138549)
Chief, Criminal Division
4
5 JAY WEILL (CSBN 185358)
CYNTHIA STIER (DCBN 423256)
Assistant United States Attorneys
6 450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
7 Telephone: (415) 436-7534
FAX: (415) 436-7234
Attorneys for Plaintiff

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9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION

12 UNITED STATES OF AMERICA,) No. CR 06-0144 JSW
13 Plaintiff,)
14 v.)
15 RENATO MENDOZA MEDINA,)
a/k/a Rene Mendoza Medina,)
16 PHYLLIS REYES CUISON,)
a/k/a Phyllis Cundangan Reyes, and)
17 RAWLIN CUNDANGAN REYES,)
18 Defendants.)
19

**STIPULATION AND
[PROPOSED] ORDER REGARDING
EXCLUSION OF TIME**

20 The defendants came before the Court for a hearing on pretrial motions on October 31, 2006.

21 At that hearing, the case was scheduled for trial commencing on September 24, 2007.

22 The parties agreed, and the Court found, that the time between October 31, 2006, through
23 September 24, 2007, is properly excluded under the Speedy Trial Act, Title 18, United States
24 Code, Sections 3161(h)(8)(A) and (h)(B)(iv). The parties represent and this Court found that the
25 this delay is necessary to allow counsel for the Defendants to effectively prepare for trial. The
26 parties agree that the ends of justice served by granting the requested continuance outweigh the
27 best interest of the public and the defendants in a speedy trial.

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1 For the foregoing reasons, and as stated on the record at the hearings on October 31, 2006,
2 the Court HEREBY ORDERS the period between October 31, 2006, through September 24,
3 2007, is excluded from the speedy trial calculation under Title 18, United States Code, Sections
4 3161(h)(8)(A) and (h)(B)(iv).

5 DATED: November 3, 2006

/s/ Cynthia Stier
CYNTHIA STIER
Counsel for United States

7 DATED: November 3, 2006

/s/ Matti Fromson
MATTI FROMSON
Counsel for Renato Mendoza Medina

10 DATED: November 3, 2006

/s/ Lidia Stiglich
LIDIA STIGLICH
Counsel for Rawlin Cundangan Reyes

12 DATED: November 3, 2006

/s/ Ann Moorman
ANN MOORMAN
Counsel for Phyllis Reyes Cuisin

15 ORDER

16 For the foregoing reasons, and as stated on the record at the October 31, 2006 hearing in this
17 matter, the Court HEREBY ORDERS the period between October 31, 2006 and September 24,
18 2007 excluded from the speedy trial calculation under Title 18, United States Code, Sections
19 3161(h)(8)(A) and (h)(B)(ii) and (iv). The Court finds that the failure to grant the requested
20 continuance would unreasonably deny defense counsel the reasonable time necessary for
21 effective preparation, given the complexity of this case and the need for continuity of counsel.
22 The Court finds that the ends of justice served by granting the requested continuance outweigh
23 the best interest of the public and the defendant in a speedy trial and in the prompt disposition of
24 criminal cases.

25 IT IS SO ORDERED.

26 DATED: November 21, 2006



JEFFREY S. WHITE
United States District Judge

28 Stipulation and [proposed] Order
Regarding Exclusion of Time,
No. CR 06-0144 JSW